

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RONALD A. KATZ TECHNOLOGY)	
LICENSING, L.P.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 06-544 (GMS)
)	
TD BANKNORTH INC., et al.,)	
)	
Defendants.)	
)	

DEFENDANT TD BANKNORTH, INC'S REPLY MEMORANDUM IN SUPPORT OF THEIR MOTION TO STAY ACTION PENDING THE UNITED STATES PATENT AND TRADEMARK OFFICE'S REEXAMINATION OF PLAINTIFF'S PATENTS

On December 19, 2006, Defendant TD BankNorth, Inc. ("Defendant" or "TD BankNorth") moved the Court to stay this action (the "Motion") in its entirety pending the reexamination proceedings by the United States Patent and Trademark Office relating to patents asserted in this action by Plaintiff Ronald A. Katz Technology Licensing, L.P. ("Plaintiff"). (D.I. 65). By its motion, TD Banknorth incorporated by reference the Motion to Stay filed by the Qwest Defendants in Civil Action No. 06-546 (GMS) on Monday, December 18, 2006, and the memorandum and declaration filed in support thereof. (C.A. No. 06-546, D.I. 80-82). In further support of its Motion, TD Banknorth hereby joins in and incorporates by reference the reply memorandum filed by the Qwest Defendants in Civil Action No. 06-546 (GMS) on February 2, 2007. (D.I. 87).

For all the reasons cited in the Qwest Defendants' Motion to Stay and supporting memoranda and declaration (C.A. No 06-546, D.I. 80-82; 87), which are incorporated herein by

reference, TD Banknorth respectfully requests that the Court stay this action in its entirety pending the completion of all of the reexamination proceedings by the United States Patent and Trademark Office involving Plaintiff's United States patents that have been asserted in this action as well as other related but unasserted patents.

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Dated: February 5, 2007


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UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2007, I caused to be served by hand delivery the foregoing document and electronically filed the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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